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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO
individually and on behalf of all similarly
situated,

Plaintiffs,

vs.

GOOGLE LLC,
Defendant.

Case No.: 4:20-cv-03664-YGR-SVK

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
GOOGLE'S MATERIAL SHOULD BE
SEALED**

The Honorable Susan van Keulen

Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether Google LLC's ("Google") material should be sealed. The material is included within Plaintiffs' Response to the Court's Order to Show Cause (Dkt. 784) ("Plaintiffs' Response").

Document Sought to Be Sealed	Party Claiming Confidentiality	Portions to be Filed Under Seal	Basis for Sealing
Plaintiffs' Response.	Google	Portions highlighted in yellow	Refers to Material Designated "Highly Confidential" and "Confidential" by Google pursuant to the Protective Order
Exhibit 1 to the Declaration of Mark Mao.	Google	Entire document	Material Designated "Highly Confidential" and "Confidential" by Google pursuant to the Protective Order
Exhibit 2 to the Declaration of Mark Mao.	Google	Entire document	Material Designated "Highly Confidential" and "Confidential" by Google pursuant to the Protective Order
Exhibit 3 to the Declaration of Mark Mao.	Google	Entire document	Material Designated "Highly Confidential" and "Confidential" by Google pursuant to the Protective Order
Exhibit 4 to the Declaration of Mark Mao.	Google	Entire document	Material Designated "Highly Confidential" and "Confidential" by Google pursuant to the Protective Order
Exhibit 5 to the Declaration of Mark Mao.	Google	Entire document	Material Designated "Highly Confidential" and "Confidential" by Google pursuant to the Protective Order

Exhibit 6 to the Declaration of Mark Mao.	Google	Entire document	Material Designated “Highly Confidential” and “Confidential” by Google pursuant to the Protective Order
Exhibit 7 to the Declaration of Mark Mao.	Google	Entire document	Material Designated “Highly Confidential” and “Confidential” by Google pursuant to the Protective Order
Declaration of Christopher Thompson.	Google	Entire document	Material Designated “Highly Confidential” and “Confidential” by Google pursuant to the Protective Order
Declaration of Jay Bhatia.	Google	Entire document	Material Designated “Highly Confidential” and “Confidential” by Google pursuant to the Protective Order

Under Civil Local Rule 79-5(f), Google, as the designating party, bears the burden of establishing that the designated material is sealable.

Dated: January 20, 2023

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By /s/ Mark C. Mao

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